

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,)	Civil No.: CV04 00049 JMS-BMK
)	(In Admiralty)
Plaintiff,)	
)	DECLARATION OF THOMAS E.
vs.)	IRONS; EXHIBITS "A" – "C"
)	
MATSON NAVIGATION)	
COMPANY, INC.; and PACIFIC)	
LIVESTOCK, INC.,)	
)	
Defendants.)	
_____)	

DECLARATION OF THOMAS E. IRONS

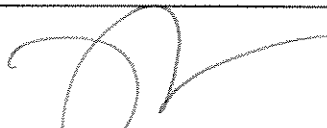
I, THOMAS E. IRONS, hereby declare:

1. I am one of the attorneys representing Defendant Pacific Livestock, Inc. ("PLI"), and have personal knowledge herein.
2. I am an attorney with Hughes & Taosaka, and am licensed to practice law before the courts of the State of Hawaii.
3. Attached hereto as Exhibit "A" is a true and correct copy of records I downloaded from the U.S. Naval Observatory Astronomical Applications Department's website.
4. Attached hereto as Exhibit "B" is a true and correct copy of Matson Navigation Company Policy number E-01-040, which was authenticated and submitted into the court record through the Declaration of Steve Rubin, filed

on February 14, 2006, in connection with Matson Navigation Company, Inc.
("Navigation") summary judgment motion against PLI.

5. Attached hereto as Exhibit "C" is a true and correct copy of
excerpts taken from the deposition of Plaintiff.

I declare under penalty of perjury that the foregoing is true and
correct.

DATED at Honolulu, Hawaii MAR 30 2006

THOMAS E. IRONS